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8 Attorneys for Nominal Defendant Juniper
Networks, Inc. and Defendants

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 In re JUNIPER DERIVATIVE ACTIONS)

No. 5:06-cv-03396-JW

13 _____)
This Document Relates To:)

14 ALL ACTIONS.)
15 _____)
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STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING FILING OF
CONSOLIDATED COMPLAINT AND
BRIEFING SCHEDULE

1 This Stipulation is entered into by and among plaintiffs, nominal defendant Juniper
2 Networks, Inc. ("Juniper") and defendants Scott G. Kriens, Stratton D. Sclavos, William R.
3 Stensrud, Robert M. Calderoni, Kenneth A. Goldman, William R. Hearst III, Kenneth Levy, Frank J.
4 Marshall, Robert R.B. Dykes, Pradeep Sindhu, James A. Dolce, Jr., Marcel L. Gani, Steven R. Haley
5 and Peter L. Wexler, through their attorneys of record.

6 WHEREAS, the parties previously stipulated on January 11, 2007 that plaintiffs shall file and
7 serve their Consolidated Complaint within three weeks after Juniper files its restated financial
8 statements with the Securities Exchange Commission, or February 23, 2007, which ever occurred
9 first;

10 WHEREAS, Juniper has not yet filed its restated financial statements, but intends to do so by
11 March 31, 2007,

12 WHEREAS, Defendants and Plaintiffs would like to synchronize the schedule of this case
13 with that of the related class action *In re Juniper Networks, Inc. Securities Litigation*, No. C06-
14 04327 JW;

15 WHEREAS, Defendants and Plaintiffs have agreed that Plaintiffs may file and serve their
16 Consolidated Complaint within thirty (30) days after Juniper files its restated financial statements
17 with the Securities Exchange Commission; Defendants shall file and serve their response to the
18 Consolidated Complaint 45 days after service of the Consolidated Complaint; Plaintiffs shall file and
19 serve their opposition 45 days after service of the Defendants' response; and Defendants shall file
20 and serve their reply 21 days after service of the opposition.

21 THEREFORE, the undersigned parties stipulate as follows:

22 1. Plaintiffs shall file and serve their Consolidated Complaint no later than thirty (30)
23 days after Juniper files its restated financial statements with the Securities Exchange Commission;

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2. Defendants shall file and serve their response to the Consolidated Complaint 45 days after service of the Consolidated Complaint;

3. Plaintiffs shall file and serve their opposition within 45 days after service of Defendants' response; and

4. Defendants shall file and serve their reply 21 days after service of the opposition.

IT IS SO STIPULATED.

DATED: February 14, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

/s/ Joni Ostler
JONI OSTLER

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Attorneys for Defendants

I, Joni Ostler, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint and Briefing Schedule. In compliance with General Order 45, X.B., I hereby attest that Benny C. Goodman has concurred in this filing.

DATED: February 14, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
TRAVIS E. DOWNS III
BENNY C. GOODMAN II

/s/ Benny C. Goodman
BENNY C. GOODMAN

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Additional Counsel for Plaintiffs

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: 2/15/2007


THE HONORABLE JAMES WARE
UNITED STATES DISTRICT JUDGE